

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CATHERINE ALEXANDER,

Plaintiff,

v.

TAKE-TWO INTERACTIVE SOFTWARE,
INC., et al.,

Defendants.

Case No. 3:18-cv-0966-SMY

PLAINTIFF'S SECOND AMENDED RULE 26(a)(3) PRETRIAL DISCLOSURES

Plaintiff Catherine Alexander ("Plaintiff"), by counsel and in accordance with Federal Rule of Civil Procedure 26(a)(3) submits the following for its Second Amended Pretrial Disclosures:

I. WITNESSES (LIVE AND THROUGH DEPOSITION DESIGNATION)

Pursuant to the Court's Case Management Procedures and Fed. R. Civ. P. 26(a)(3)(i), Plaintiff identifies the following list of witnesses she intends to call to testify live at trial. Plaintiff reserves the right to call a witness listed by Defendants and to call any additional witnesses in rebuttal to those witnesses called by Defendants.

1. Catherine Alexander;
2. Dr. Jose Zagal, Plaintiff's Technical expert;
3. Ryan Clark, Plaintiff's Damages expert.

Plaintiff may call the following witness:

4. Take-Two Defendants corporate representative Alfredo Brody.
5. Any witness, employee, officer, or representative of any Defendant who is present in the courtroom at any point during trial.

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(ii), Plaintiff designates testimony from the following witnesses via depositions with designations of those depositions attached as **Exhibit A**.

5. Take-Two Defendants via corporate representative deposition of Mark Little;
6. Take-Two Defendants via corporate representative deposition of Chris Snyder; and
7. WWE via corporate representative deposition of Edward Kiang.

II. EXHIBITS

Pursuant to Federal Rule of Civil Procedure 26(a)(3)(A)(iii), parties are to provide “an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.”

Plaintiff expects to offer or may offer, if the need arises, the documents and other exhibits identified in the amended exhibit list attached hereto as **Exhibit B**. Exhibits in this case include multimedia exhibits such as the subject video games (WWE 2K16, WWE 2K17 and WWE 2K18, “the WWE 2K Video Games”) and recordings of playing sessions of the WWE 2K Video Games. Plaintiff intends to play live portions of the WWE 2K Video Games and offer recordings, selections of recordings, and/or screenshots of recorded playing sessions of the WWE 2K Video Games.

Plaintiff may use discovery answers, pleadings, any other documents exchanged in discovery, and any and all exhibits designated by Defendants if the need arises. Plaintiff may use any materials brought to the Court by any witness.

Plaintiff will utilize demonstrative exhibits, including without limitation illustrations, summaries, charts, models, computer animations, PowerPoint presentations, videos, and enlargements of portions of exhibits.

Plaintiff is unaware at this time of any additional exhibits that she may offer if the need arises, but reserves the right to present rebuttal or impeachment evidence as necessary.

Dated: August 26, 2022

Respectfully submitted,

/s/ Anthony G. Simon

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon all counsel of record via this Court's CM/ECF system on August 26, 2022.

/s/ Anthony G. Simon

EXHIBIT A – PLAINTIFF’S DEPOSITION DESIGNATIONS

Mark Little – August 14, 2019 30(b)(6) of Take-Two Defendants		
#	Page:Line	Exhibits
1	7:20-22	
2	8:17-20	
3	11:14-24	
4	19:18-20:10	
5	21:14-17	
6	21:24-22:8	Exhibit 2
7	22:12-14	
8	22:25-23:12	
9	24:2-6	
10	41:15-42:12	Exhibit 3
11	42:23-44:2	
12	44:5-10	
13	45:20-46:9	
14	49:6-8	
15	49:12-50:11	
16	56:19-57:6	
17	57:18-23	
18	58:1-9	
19	58:12-16	
20	65:2-11	
21	67:18-68:17	
22	80:17-81:1	
23	85:18-22	
24	86:22-88:19	
25	90:22-23	
26	91:1-15	
27	95:11-18	
28	105:25-106:13	
29	106:17-23	
30	107:1-11	
31	118:12-119:4	Exhibit 5 Exhibit 6
32	130:4-132:1	
33	146:25-147:19	
34	149:1-6	
35	149:9-18	
36	156:4-16	Exhibit 8
37	157:8-23	
38	158:1-160:14	
39	163:3-164:7	

Mark Little – August 14, 2019		
30(b)(6) of Take-Two Defendants		
#	Page:Line	Exhibits
40	164:23-165:3	
41	166:7-10	
42	166:12-23	
43	168:4-10	
44	169:7-8	
45	169:13-170:14	
46	170:24-172:5	
47	172:8-25	

Chris Snyder – August 14, 2019		
30(b)(6) of Take-Two Defendants		
#	Page:Line	Exhibits
1	6:15-17	
2	7:21-8:5	
3	8:15-9:9	
4	12:7-11	
5	12:21-13:8	
6	13:14-14:13	
7	14:19-15:12	
8	17:1-17:5	Exhibit 2
9	24:10-20	
10	26:5-8	
11	26:10-28:3	Exhibit 7
12	31:9-22	
13	33:17-23	
14	34:2-14	
15	34:19-21	
16	36:7-8	
17	36:19-20	
18	36:23-24	
19	37:3-4	
20	43:12-19	Exhibit 10
21	44:1-8	
22	44:24-45:10	
23	47:10-48:5	
24	60:23-24	
25	61:6-7	

Edward Kiang – August 4, 2020		
30(b)(6) of World Wrestling Entertainment		
#	Page:Line	Exhibits
1	7:7-24	

Edward Kiang – August 4, 2020		
30(b)(6) of World Wrestling Entertainment		
#	Page:Line	Exhibits
2	10:10-11:7	
3	13:15-18	
4	14:1-9	
5	15:8-11	
6	15:14-19	
7	15:22-24	
8	16:3-13	
9	16:18-21	
10	17:23-18:7	Exhibit 2
11	18:17-20	
12	22:4-9	Exhibit 3
13	23:11-24:7	
14	24:10-15	
15	24:19-25:6	
16	25:20-25	
17	26:2-10	
18	26:15-18	
19	26:2-10	
20	26:15-18	
21	30:18-24	
22	31:2-9	
23	31:17-21	
24	32:15-33:2	
25	33:14-17	
26	33:21-34:6	
27	34:9-12	
28	35:7-21	
29	36:16-37:13	
30	39:6-25	
31	40:1-3	
32	40:8-14	
33	40:17-21	
34	40:24-41:14	
35	41:18-21	
36	42:6-43:12	
37	43:15-20	
38	43:24-44:16	
39	45:8-25	
40	46:9-20	
41	46:23-48:6	
42	49:23-50:2	
43	50:7-11	

Edward Kiang – August 4, 2020		
30(b)(6) of World Wrestling Entertainment		
#	Page:Line	Exhibits
44	50:18-51:24	
45	52:25-53:5	
46	53:9-12	
47	55:7-24	
48	56:23-57:24	
49	58:2-10	
50	61:8-9	
51	65:4-67:10	
52	67:15-18	
53	68:4-11	
54	68:15-22	
55	68:25-69:10	
56	69:15-18	
57	69:21-22	
58	70:6-71:5	
59	71:13-22	
60	72:9-12	
61	72:15-73:5	
62	74:2-9	
63	74:11-16	
64	75:1-4	
65	75:21-24	
66	76:4-6	
67	76:10	
68	76:21-23	
69	77:1-2	
70	78:17-79:11	Exhibit 4
71	80:21-81:2	
72	81:11-16	
73	82:4-12	
74	88:17-89:2	Exhibit 5
75	95:8-22	
76	96:6-97:3	Exhibit 6
77	97:10-14	
78	97:18-98:15	
79	115:15-115:23	Exhibit 7
80	116:17-117:18	

EXHIBIT B – PLAINTIFF’S AMENDED TRIAL EXHIBIT LIST

Plaintiff’s Exhibit No.	Description
1	Certificate of Registration from the U.S. Copyright Office –Dove [ALEXANDER000060-61]
2	Certificate of Registration from the U.S. Copyright Office – Rose [ALEXANDER000062]
3	Certificate of Registration from the U.S. Copyright Office – Skulls [ALEXANDER000063-64]
4	Certificate of Registration from the U.S. Copyright Office – Tribal Addition [ALEXANDER000065-66]
5	Certificate of Registration from the U.S. Copyright Office – Tribal Design [ALEXANDER000070-71]
6	Copyright registration application for Tribal Addition design [ALEXANDER000001-4, Alexander Depo Exh 3]
7	Copyright registration application for Dove design [ALEXANDER000009-14, Alexander Depo Exh 16]
8	Copyright registration application for Rose design [ALEXANDER000015-19, Alexander Depo Exh 17]
9	Copyright registration application for Skulls design [ALEXANDER000020-24, Alexander Depo Exh 18]
10	Copyright registration application for Tribal design [ALEXANDER000025-28, Alexander Depo Exh 7]
11	Photograph of Plaintiff and Mr. Orton [ALEXANDER000036]
12	Sketch of Plaintiff’s dove tattoo design [ALEXANDER000037, Alexander Depo Exh 12]
13	Sketch of Plaintiff’s tribal addition tattoo design [ALEXANDER000038, Alexander Depo Exh 5]
14	Sketch of Plaintiff’s tribal addition tattoo design [ALEXANDER000039, Alexander Depo Exh 6]
15	Sketch of Plaintiff’s tribal addition tattoo design [ALEXANDER000040, Alexander Depo Exh 4]
16	Sketch of Plaintiff’s tribal design addition for Mr. Orton’s tattoos arm(s) [ALEXANDER000041, Alexander Depo Exh 8]
17	Photograph of Mr. Orton with tattoos on arms [ALEXANDER000043, Alexander Depo Exh 11]
18	Photograph of Mr. Orton’s arm tattoos [ALEXANDER000044, Alexander Depo Exh 10]
19	Photograph of Mr. Orton’s upper arm tribal design and partial view of back tribal addition [ALEXANDER000045, Alexander Depo Exh 14]
20	Photograph of Mr. Orton’s tattoos on arms [ALEXANDER000046]
21	Photograph of Mr. Orton’s upper arm and upper back tribal tattoos [ALEXANDER000047]
22	Photograph of Mr. Orton’s Rose arm tattoos [ALEXANDER000048, Alexander Depo Exh 13]

Plaintiff's Exhibit No.	Description
23	Photograph of Mr. Orton's skull arm tattoos [ALEXANDER000049]
24	George Lopez show, interview of Mr. Orton [ALEXANDER000050]
25	Article: The 20 Coolest Tattoos in WWE History [Zagal Depo Exh 3]
26	WWE 2K Franchise Sales Since Apr'2015 [TAKE-TWO_0000982, Snyder Depo Exh 9]
27	WWE 2K Franchise Sales Since Apr'2015 [TAKE-TWO_0000983, Snyder Depo Exh 10]
28	WWE 2K Franchise Sales Since Apr'2015 [TAKE-TWO_0001332, Snyder Depo Exh 11]
29	License between Take-Two Interactive Software, Inc. and World Wrestling Entertainment [TAKE-TWO_0000498-542, Little Depo Exh 2]
30	Amendment 1 to License between Take-Two Interactive Software, Inc. and World Wrestling Entertainment [TAKE-TWO_0000543-559, Little Depo Exh 3]
31	Master Development Agreement between Yuke's Co., Ltd. and World Wrestling Entertainment [TAKE-TWO_0000560-609, Little Depo Exh 4]
32	Images of Mr. Orton [TAKE-TWO_0000798-822, Little Depo Exh 5]
33	Images of Mr. Orton [TAKE-TWO_0000909-929, Little Depo Exh 6]
34	Screenshot of WWE 2K16 video of Mr. Orton's tattoos [TAKE-TWO_0000481, Little Depo Exh 7]
35	IndianVideoGamer.com Interview: WWE 2K18 Executive Producer Mark Little [Little Depo Exh 8]
36	United States Securities and Exchange Commission – Form 10-K for Take-Two Interactive Software, Inc. for the fiscal year ended March 31, 2018 [Clark Depo Exh 4]
37	Curriculum Vitae of José Zagal dated March 2018
38	Curriculum Vitae of Ryan Clark dated February 19, 2019
39	Take-Two Interactive Software, Inc. Consolidated Statements of Operations for the Fiscal Years ended March 31, 2016 through 2018 [Exhibit C. to R. Clark's Rebuttal Report]
40	Reserved
41	Reserved
42	Physical copy of WWE 2K16, XBOX ONE format [M. Little's Declaration, Doc 142-1]
43	Packaging and insert of WWE 2K16 XBOX ONE format [M. Little's Declaration, Doc 142-1]
44	Physical copy of WWE 2K17, XBOX ONE format [M. Little's Declaration, Doc 142-1]
45	Packaging and insert of WWE 2K17 XBOX One format [M. Little's Declaration, Doc 142-1]
46	Physical copy of WWE 2K18, XBOX ONE format [M. Little's Declaration, Doc 142-1]

Plaintiff's Exhibit No.	Description
47	Packaging and insert of WWE 2K18 XBOX One format [M. Little's Declaration, Doc 142-1]
48	Physical copy of WWE 2K16, Sony PlayStation 4 format [TAKE-TWO_0000001]
49	Packaging and Insert of WWE 2K16 Sony PlayStation 4 format [TAKE-TWO_0000001]
50	Physical copy of WWE 2K17, Sony PlayStation 4 format [TAKE-TWO_0000002]
51	Packaging and Insert of WWE 2K17 Sony PlayStation 4 format [TAKE-TWO_0000002]
52	Physical copy of WWE 2K18, Sony PlayStation 4 format [TAKE-TWO_0000003]
53	Packaging and Insert of WWE 2K18 Sony Play Station 4 format [TAKE-TWO_0000003]
54	WWE Source Product Submission #3540 [Kiang Depo Exh 4; WWE_Alexander0000109]
55	WWE Source Product Submission #17984 [Kiang Depo Exh 5; WWE_Alexander0000207]
56	WWE Source Product Submission #4073 [Kiang Depo Exh 6; WWE_Alexander0000112]
57	Bryce Yang's 8-6-14 Email Chain [Kiang depo Exh 7; WWE_Alexander0000094]
58	Screenshot of WWE 2K15 video of Mr. Orton's tattoos [WWE_Alexander_0000098]
59	Screenshot of WWE 2K17 video of Mr. Orton's tattoos [WWE_Alexander_0000166]
60	Video of Mr. Orton's videogame character [TAKE-TWO_0000823.M4V]
61	Video of Mr. Orton from WWE 2K Game [WWE_Alexander0000172.m4v]
62	Video of Mr. Orton from WWE 2K Game [WWE_Alexander0000180.m4v]
63	Trailer for WWE 2K17 containing Mr. Orton [WWE_Alexander0000200.mp4]
64	Trailer for WWE 2K16 containing Mr. Orton [TAKE-TWO_0000481.mp4]
65	Capture from the videogame WWE 2K16 depicting the infringing Rose tattoo [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]
66	Capture from the videogame WWE 2K16 depicting the infringing dove tattoo [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]
67	Capture from the videogame WWE 2K16 depicting the infringing skulls tattoo [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]
68	Capture from the videogame WWE 2K16 depicting the infringing tribal tattoo [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]
69	Capture from the videogame WWE 2K16 depicting the infringing tribal addition tattoo [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]

Plaintiff's Exhibit No.	Description
70	Capture from the videogame WWE 2K17 depicting the infringing Rose tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
71	Capture from the videogame WWE 2K17 depicting the infringing dove tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
72	Capture from the videogame WWE 2K17 depicting the infringing skulls tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
73	Capture from the videogame WWE 2K17 depicting the infringing tribal tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
74	Capture from the videogame WWE 2K17 depicting the infringing tribal addition tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
75	Capture from the videogame WWE 2K18 depicting the infringing Rose tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
76	Capture from the videogame WWE 2K18 depicting the infringing dove tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
77	Capture from the videogame WWE 2K18 depicting the infringing skulls tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
78	Capture from the videogame WWE 2K18 depicting the infringing tribal tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
79	Capture from the videogame WWE 2K18 depicting the infringing tribal addition tattoo on Randy Orton's in game character model [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
80	Photographs of the rose tattoo on Randy Orton [ALEXANDER000018-19]
81	Photographs of the dove tattoo on Randy Orton [ALEXANDER000012-14]
82	Photographs of the skulls tattoo on Randy Orton [ALEXANDER000023-24]
83	Photographs of the tribal tattoo on Randy Orton [ALEXANDER000028]
84	Photographs of the tribal addition tattoo on Randy Orton [ALEXANDER000004]
85	World Wrestling Entertainment, Inc.'s Objections and Responses to Plaintiff's First Set of Interrogatories dated August 17, 2018
86	World Wrestling Entertainment, Inc.'s Objections and Responses to Plaintiff's First Set of Requests for Admission dated August 17, 2018
87	Defendant World Wrestling Entertainment, Inc.'s Objections to Plaintiff's Second Set of Requests for Admission dated October 15, 2018
88	Defendant World Wrestling Entertainment, Inc.'s Objections to Plaintiff's First Set of Requests for Production dated October 15, 2018

Plaintiff's Exhibit No.	Description
89	Defendant World Wrestling Entertainment, Inc.'s Objections to Plaintiff's Second Set of Interrogatories dated October 15, 2018
90	Defendant World Wrestling Entertainment, Inc.'s Objections to Plaintiff's Second Set of Requests for Production dated November 19, 2018
91	Defendant World Wrestling Entertainment, Inc.'s Supplemental Objections and Responses to Plaintiff's First Set of Requests for Production dated May 15, 2020
92	Defendant World Wrestling Entertainment, Inc.'s Supplemental Objections and Responses to Plaintiff's Second Set of Interrogatories dated May 15, 2020
93	Defendant World Wrestling Entertainment, Inc.'s Supplemental Objections and Responses to Plaintiff's Second of Requests for Admission dated May 15, 2020
94	Defendant Take-Two Interactive Software, Inc.'s Objections and Responses to Plaintiff Catherine Alexander's First Set of Requests for Admission dated October 15, 2018
95	Defendant 2K Games, Inc.'s Objections and Responses to Plaintiff Catherine Alexander's First Set of Requests for Admission dated October 15, 2018
96	Defendant 2K Sports, Inc.'s Objections and Responses to Plaintiff Catherine Alexander's First Set of Requests Admission dated October 15, 2018
97	Defendant Visual Concepts Entertainment's Objections and Responses Plaintiff Catherine Alexander's First Set of Requests for Admission dated October 15, 2018
98	Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment's Objections and Responses to Plaintiff Catherine Alexander's First Set of Requests for Production dated October 15, 2018
99	Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment's Objections and Responses to Plaintiff Catherine Alexander's First Set of Interrogatories dated October 15, 2018
100	Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment's Objections and Responses to Plaintiff Catherine Alexander's Second Set of Requests for Production dated November 19, 2018
101	Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment's Objections and Responses to Plaintiff Catherine Alexander's Third Set of Requests for Production dated October 11, 2019
102	Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., and Visual Concepts Entertainment's Objections and Responses to Plaintiff Catherine Alexander's Second Set of Requests for Admissions dated October 11, 2019
103	Cover art for WWE 2K12 depicting Randy Orton
104	WWE 2K16 video [TAKE-TWO_0000177.mp4]

Plaintiff's Exhibit No.	Description
105	WWE 2K16 video [TAKE-TWO_0000178.mp4]
106	WWE 2K17 video [TAKE-TWO_0000179.mp4]
107	WWE 2K17 video [TAKE-TWO_0000180.mp4]
108	WWE 2K18 video [TAKE-TWO_0000181.mp4]
109	WWE 2K18 video [TAKE-TWO_0000182.mp4]
110	WWE 2K17 video [TAKE-TWO_0000471.mp4]
111	WWE 2K18 video [TAKE-TWO_0000472.mp4]
112	WWE 2K18 video [TAKE-TWO_0000473.mp4]
113	WWE 2K16 video [TAKE-TWO_0000474.mp4]
114	WWE 2K18 video [TAKE-TWO_0000475.mp4]
115	WWE 2K17 video [TAKE-TWO_0000476.mp4]
116	WWE 2K17 video [TAKE-TWO_0000477.mp4]
117	WWE 2K16 video [TAKE-TWO_0000478.mp4]
118	WWE 2K16 video [TAKE-TWO_0000479.mp4]
119	WWE 2K17 video [TAKE-TWO_0000480.mp4]
120	WWE 2K17 video [TAKE-TWO_0000482.mp4]
121	WWE 2K16 video [TAKE-TWO_0000483.mp4]
122	WWE 2K17 video [TAKE-TWO_0000484.mp4]
123	WWE 2K18 video [TAKE-TWO_0000485.mp4]
124	WWE 2K17 video [TAKE-TWO_0000486.mp4]
125	WWE 2K17 video [TAKE-TWO_0000487.mp4]
126	WWE 2K17 video [TAKE-TWO_0000488.mp4]
127	WWE 2K17 video [TAKE-TWO_0000489.mp4]
128	WWE 2K16 video [TAKE-TWO_0000490.mp4]
129	WWE 2K18 video [TAKE-TWO_0000491.mp4]
130	WWE 2K17 video [TAKE-TWO_0000492.mp4]
131	WWE 2K18 video [TAKE-TWO_0000493.mp4]
132	WWE 2K18 video [TAKE-TWO_0000494.mp4]
133	WWE 2K18 video [TAKE-TWO_0000495.mp4]
134	WWE 2K18 video [TAKE-TWO_0000496.mp4]
135	360 video of Randy Orton character [TAKE-TWO_0000930.mp4]
136	360 video of Randy Orton character [WWE_Alexander0000111.mp4]
137	360 video of Randy Orton character [WWE_Alexander0000131.mp4]
138	360 video of Randy Orton character [WWE_Alexander0000134.mp4]
139	WWE 2K16 walk out video of Randy Orton character [WWE_Alexander0000139.mp4]
140	WWE 2K16 video [WWE_Alexander0000147.mp4]
141	WWE 2K16 video [WWE_Alexander0000150.mp4]
142	360 video of Randy Orton character [WWE_Alexander0000154.mp4]
143	360 video of Randy Orton character [WWE_Alexander0000161.mp4]
144	360 video of Randy Orton character [WWE_Alexander0000205.mp4]
145	360 video of Randy Orton character [WWE_Alexander0000206.mp4]
146	Reserved

Plaintiff's Exhibit No.	Description
147	Reserved
148	Defendant World Wrestling Entertainment, Inc.'s Second Supplemental Objections and Responses to Plaintiff's First and Second Sets of Interrogatories dated September 23, 2020.
149	Reserved
150	Video compilation of selected game play sessions from WWE 2K16. Plaintiff intends to introduce all or part of this video compilation and/or screenshots therefrom. [M. Little's Declaration, Doc 142-24, WWE2K16 Xbox Game]
151	Video compilation of selected game play sessions from WWE 2K17. Plaintiff intends to introduce all or part of this video compilation and/or screenshots therefrom. [M. Little's Declaration, Doc 142-25, WWE2K17 Xbox Game]
152	Video compilation of selected game play sessions from WWE 2K18. Plaintiff intends to introduce all or part of this video compilation and/or screenshots therefrom. [M. Little's Declaration, Doc 142-26, WWE2K18 Xbox Game]
153	Video compilation of selected game play sessions from WWE 2K16 (selections from Exhibit 150)
154	Video compilation of selected game play sessions from WWE 2K17 (selections from Exhibit 151)
155	Video compilation of selected game play sessions from WWE 2K18 (selections from Exhibit 152)